

**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD**

JAM PRODUCTIONS, LTD. and EVENT)
PRODUCTIONS, INC., A SINGLE)
EMPLOYER)

Respondents,)

and)

THEATRICAL STAGE EMPLOYEES)
UNION LOCAL NO. 2, IATSE,)

Charging Party.)

Case No.: 13-CA-177838

**RESPONDENTS' AGREED MOTION FOR
EXTENSION OF TIME FOR FILING EXCEPTIONS**

Respondents Jam Productions, Ltd., et al., pursuant to Section 102.46(a) of the Board's Rules & Regulations, move for an extension of time for filing exceptions from June 23, 2017 until July 10, 2017. In support hereof, Respondents submit the attached Declaration of Steven L. Gillman. This motion is by agreement of counsel for the General Counsel and counsel for the Union.

Respectfully submitted,

/s/ Steven L. Gillman
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DECLARATION OF STEVEN L. GILLMAN

I, Steven L. Gillman, hereby depose and state:

1. I am lead counsel for Respondents in the captioned matter.
2. On May 26, 2017, Respondents received by electronic mail the Decision of Administrative Law Judge Rosas in the captioned matter. Exceptions are due June 23, 2017.
3. Based upon my schedule, Respondents respectfully request an extension of time for filing exceptions from June 23, 2017 until July 10, 2017:
 - a. On May 31, 2017, I filed a Motion for Economic Reinstatement in Lieu of Preliminary Reinstatement in a complex retaliatory discharge matter brought by OSHA under the Surface Transportation Assistance Act. *Jill Grass v. Hartwig Transit, Inc.*, OSHA Case No. 7-2260-16-001. I worked on that motion on May 30 & 31. May 29 was the Memorial Day holiday.
 - b. On June 5, 2017, I represented the employer in a previously-scheduled labor arbitration hearing in Joliet, Illinois, in the matter of *Local 1, SEIU/Josette Hobbs v. Exelon Generation*. I met with witnesses and prepared for the arbitration on June 1 & 2, 2017.
 - c. On June 7, 2017, I presented a previously-scheduled and advertised speech on employment issues for clients of my law firm. I prepared for the speech on June 6.

d. On June 15, 2017, I have due an Answer, Position Statement and a Response to Questionnaire for the employer in a race discrimination case pending before the Pennsylvania Human Relations Commission in the matter of *Deanmychal DeBardelaben v. Donor Services Group, LLC*, PHRC Case No. 201601836. I have been working on these documents as time permits.

e. On June 20 and 21, 2017, I am scheduled to handle a labor arbitration in Lisle, Illinois, for the employer in the matter of *IBEW, Local 15/Facilities Maintenance Agreement v. Exelon Generation*. I am scheduled to meet with witnesses and prepare for the hearing on June 14, 15, 16, and 19, 2017.

f. On June 30, 2017, I have due a post-hearing brief for a labor arbitration I handled for the employer on April 12 & 13, in the matter of *Local 15, IBEW/Jaborek and Exelon Generation*. The case involves issues of first impression involving the interplay of Nuclear Regulatory Commission Regulations regarding fitness for duty and the functions of a Substance Abuse Expert.

g. Throughout this period of time I have also attended to other matters as they arise and I will need to continue to do so.

4. Counsel for the Union and the General Counsel have no objection to this requested extension.

5. No prior extension has been requested.

I have read the foregoing statement and it is true and correct to the best of my knowledge.

If sworn as a witness, I can testify competently to the facts stated herein.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 7, 2017.

/s/Steven L. Gillman

CERTIFICATE OF SERVICE

I, the undersigned attorney, being duly sworn, state that on June 7, 2017, I had served the **Respondents' Motion for Extension of Time for Filing Exceptions** upon the following:

Via Regular Mail and Electronic Mail

Kevin McCormick, Esq.
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/s/ Steven L. Gillman _____